

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC. RENTAL
SOFTWARE ANTITRUST LITIGATION
(NO. II)**

Case No. 3:23-md-3071
MDL No. 3071

Honorable Waverly D. Crenshaw

**Declaration of Isaac T. Conner on Behalf of
Frazer PLC in Support of Scott & Robins'
Leadership Application**

This Document Relates to: ALL CASES

**DECLARATION OF ISAAC T. CONNER ON BEHALF OF FRAZER PLC IN SUPPORT
OF
SCOTT & ROBINS LEADERSHIP APPLICATION**

I, Isaac T. Conner, pursuant to 28 U.S.C. § 1746, declare that the following is true and correct to the best of my knowledge and belief.

1. I am a member of and in good standing of the Tennessee Bar. I am a partner with the law firm Manson Johnson Conner, PLLC and of counsel at Frazer, PLC for plaintiffs in the following action, *Blosser v. RealPage, et al.*, 3:23-cv-00445, which is part of the above-captioned multidistrict litigation (the “MDL”).

2. Pursuant to this Court’s April 19, 2023 Order (Dkt. No. 3) and the May 31, 2023 Minute Entry, I submit this declaration in support of the Watters Plaintiffs’ Leadership Application submitted by Scott+Scott Attorneys at Law LLP and Robins Kaplan LLP (the “Scott & Robins Leadership Application”).

3. I have been a trial lawyer involved in complex litigation for 20 years. During that time, I have served as Plaintiff’s counsel in *In Re: Davol, Inc./C.R. Bard, Inc.*, (Case No. 2:18-md-

2846) as well as co-representing the city of Nashville with Lieff Cabraser against all opioid manufacturers and distributors. Based on this experience, my work with Frazer, PLC and my understanding of the circumstances of this MDL, I support the Scott & Robins Leadership Application.

4. My “mass tort” litigation career has provided me the good fortune of meeting and working with several top litigators over the last few years. I affiliated with Frazer, PLC because of their well-respected reputation in complex litigation and specifically, in MDL litigation.

5. Outside of “mass tort” litigation, I handle complex health care liability cases and personal injury litigation in both state and federal court.

6. I am familiar with the work of Scott + Scott Attorneys at Law LLP (“Scott+Scott”) and Robins Kaplan LLP (“Robins”) through my work Frazer, PLC. Scott+Scott and Robin are both qualified to lead the Multifamily Plaintiffs in this MDL and I support the appointment of these two firms as interim co-lead counsel, as set forth in the Scott & Robins Leadership Application.

7. I am also familiar with the firms who are seeking appointment to the Plaintiffs’ Steering Committee as part of the Scott & Robins Leadership Application. These law firms are all highly respected based on their substantial experience litigating complex antitrust class actions and achieving outstanding results for their clients and class members. I support the appointment of these firms to positions on the Plaintiffs’ Steering Committee.

8. I am familiar with Tricia Herzfeld, Esq. of Herzfeld, Suetholz, Gastel, Liniski, and Wall, PLLC, as well as other partners in her law firm and support the appointment of Ms. Herzfeld as Plaintiffs’ Liaison Counsel, pursuant to the Scott & Robins Leadership Application.

9. Frazer PLC is available and willing to assist Scott & Robins Leadership team should they ask for our assistance in prosecuting this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2023

Nashville, Tennessee

/s/Isaac T. Conner

Isaac T. Conner

TN Bar No. 022736

FRAZER PLC

iconner@mansonjohnsonlaw.com

30 Burton Hills Blvd., Ste. 450

Nashville, TN 37215

O: (615)647-6464

F: (615)307-4902